

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

IN RE: Robert A. Dollinger,

Chapter 13

Case No. 15-60014

Debtor.

**STIPULATION BETWEEN SETERUS, INC. AND DEBTOR, ROBERT
DOLLINGER REGARDING TREATMENT OF SETERUS, INC. IN DEBTOR'S
CHAPTER 13 PLAN**

IT IS HEREBY AGREED AND STIPULATED by and between Seterus, Inc. ("Secured Creditor") and Robert A. Dollinger ("Debtor"), through his attorney, Peter A. Orville, as follows:

WHEREAS, Seterus, Inc. filed a Proof of Claim on May 13, 2015 as claim number 19 indicating pre-petition arrears in the amount of \$16,886.21 and a total claim in the amount of \$88,143.08.

WHEREAS, Robert Dollinger desires to enter into a mortgage loan modification with Seterus, Inc. on the Debtor's property located at 75 Liberty Highway, Windsor, NY 13865-1026.

WHEREAS, the Debtor's proposed Chapter 13 plan calls for a "cram down" of the Seterus, Inc. debt to \$70,000.00 at 5% interest.

WHEREAS, the Debtor has submitted and the Secured Creditor has received a loan modification application.

IT IS THEREFORE STIPULATED, that upon entering in to a mortgage modification between Robert Dollinger and Seterus, Inc. that the Chapter 13 plan will be amended to remove the "cram down" of the Seterus, Inc. claim and to treat the Seterus, Inc. claim pursuant to the modification agreement between the parties.

Dated: 2/2/16




Peter A. Orville, Esq.
Attorney for Debtor

Dated: 2/2/16



Michael J. Chatwin, Esq.
Attorney for Seterus, Inc.

Dated: 2/5/16

 Staff Attorney
for Mark W. Swimelar, Esq.
Chapter 13 Trustee